

EXHIBIT 27

KATHY ELLIOTT DEGEORGE - 2/4/2020

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|---|---|
| <p style="text-align: right;">Page 5</p> <p>1 and that you understand.</p> <p>2 If you want to take a break, just let me</p> <p>3 know. I think this is going to take 30, 45 minutes.</p> <p>4 Still, even if you need to take a break, just let me</p> <p>5 know.</p> <p>6 A. Okay.</p> <p>7 Q. Have you taken any medications today that would</p> <p>8 affect your ability to testify truthfully?</p> <p>9 A. No.</p> <p>10 Q. And I know this is kind of a weird question,</p> <p>11 but for the record, do you identify yourself as a</p> <p>12 Caucasian female?</p> <p>13 A. I do.</p> <p>14 Q. Okay. And how long have you worked for</p> <p>15 Siemens?</p> <p>16 A. Just over five years.</p> <p>17 Q. Okay. And were you working for Siemens during</p> <p>18 the time period where Rolls-Royce was the business</p> <p>19 entity -- strike that.</p> <p>20 Have you ever worked for Rolls-Royce?</p> <p>21 A. No.</p> <p>22 Q. When you started working for Siemens, what was</p> <p>23 the title of your position?</p> <p>24 A. It's called QMIP, and that means quality</p> <p>25 manager in projects.</p> | <p style="text-align: right;">Page 7</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And you mentioned something about a</p> <p>3 reorg. Can you explain to me what happened in regards</p> <p>4 to this reorganization?</p> <p>5 A. There was a massive cost-cutting effort that</p> <p>6 went on probably about the 2015 -- end of 2015 fiscal</p> <p>7 year, and they eliminated an entire organization called</p> <p>8 Business Excellence. Harriet and I were both part of</p> <p>9 that. So there were managers who left, the department</p> <p>10 itself was left, the work remained. So we basically had</p> <p>11 to disseminate the work.</p> <p>12 Q. So is your testimony the Business Excellence</p> <p>13 department no longer existed but the work for that</p> <p>14 department still needed to be done?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. So was that work under a different</p> <p>17 department now? How did you guys decide to divvy the</p> <p>18 roles?</p> <p>19 MS. GRANT: Objection; form.</p> <p>20 Q. (BY MR. BAIL) You can answer.</p> <p>21 MS. GRANT: You can answer.</p> <p>22 A. They split it in different ways. So different</p> <p>23 managers were given different elements of the work. For</p> <p>24 many of us it stayed similar and just expanded, so we</p> <p>25 took on additional responsibilities. Probably the most</p> |
| <p style="text-align: right;">Page 6</p> <p>1 Q. Okay. Is that what you currently do, as well?</p> <p>2 A. No. When the reorganizations happened, our</p> <p>3 roles changed.</p> <p>4 Q. Okay. Let's get to that.</p> <p>5 So you were quality QM --</p> <p>6 A. QMIP.</p> <p>7 Q. Okay. And how long did you hold that position?</p> <p>8 A. It was about a year, maybe a little over a year</p> <p>9 before the reorgs happened.</p> <p>10 Q. Okay.</p> <p>11 A. And they eliminated those.</p> <p>12 Q. Okay. When was the reorg, approximately?</p> <p>13 A. I would say it was in '16.</p> <p>14 Q. '16?</p> <p>15 A. I started late '14. So it would have been</p> <p>16 either late '15 or maybe I'm thinking the fiscal year</p> <p>17 '16.</p> <p>18 Q. Okay. And what was the title of your new</p> <p>19 position?</p> <p>20 A. Didn't really have a title, but I think it</p> <p>21 falls under quality professional as a technical HR role.</p> <p>22 And so under that that can fit a number of things as a</p> <p>23 title.</p> <p>24 Q. And is that the same role that you have held up</p> <p>25 until today?</p> | <p style="text-align: right;">Page 8</p> <p>1 dramatic was that QMIP role was eliminated.</p> <p>2 Q. For you?</p> <p>3 A. For me and the other two. I think only one at</p> <p>4 that point. I think Errol had already left. So -- but</p> <p>5 that was probably the most significant, at least in my</p> <p>6 space.</p> <p>7 Q. Okay. What was the name of the organization</p> <p>8 that you were under at that time?</p> <p>9 A. They didn't really fold us under a new</p> <p>10 organization. So we were somewhat homeless is the way I</p> <p>11 described it. We were positioned under different</p> <p>12 managers, so they spread us out a bit. I believe the</p> <p>13 manager that I went under at that time was Patrik Hols</p> <p>14 when they removed Business Excellence. So that was the</p> <p>15 head of finance at that time, which you can always</p> <p>16 assume is temporary.</p> <p>17 Q. So at that time if he was the head of the</p> <p>18 finance, would that mean that you were also a part of</p> <p>19 the finance division?</p> <p>20 A. I was reporting through them I think it's safe</p> <p>21 to say. It was a misfit in terms of function. My role</p> <p>22 has nothing to do with function and finance, and finance</p> <p>23 has nothing to do with my role. They don't understand</p> <p>24 that work. We had to be placed under a manager.</p> <p>25 Q. Okay. How long was Patrik Hols your manager?</p> |

2 (Pages 5 to 8)

KATHY ELLIOTT DEGEORGE - 2/4/2020

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| <p style="text-align: right;">Page 9</p> <p>1 A. Until he left the company, and I believe that 2 was '17 maybe. I'm not going to be good on dates. I 3 apologize. 4 Q. Okay. Do you recall a time period when Harriet 5 Lane was away from work for two, three months? 6 A. Yes. 7 Q. Okay. During that time period did your roles 8 change at all? 9 A. Not that I can recall. I don't believe 10 anything was added or taken away during that time 11 period. 12 Q. Okay. After that time period that she was out, 13 do you recall if your role changed at all? 14 A. My role has been evolving, yes. 15 Q. Can you please explain to the Court the 16 evolution of your role? 17 A. Sure. 18 Q. Before that, if you could tell me dates or 19 approximate dates, if you can. 20 A. I'm so bad on dates. I can tell them to you if 21 you please don't hold me to them. 22 My role from that Quality manager point in 23 time I went into a role that was largely a reporting and 24 I would call it a program management function over at 25 least two programs. I have since had a third program</p> | <p style="text-align: right;">Page 11</p> <p>1 Q. As well as Amy Barr? 2 A. Amy Barr and Melissa King. They were all 3 finance. 4 Q. How often did you work with Harriet in the year 5 2017? 6 A. It would probably just be on our audits as we 7 were assigned. Harriet was a lead auditor, and so I was 8 a coauditor for a period, and so we worked largely on 9 audit and audit issues. So frequency, it would depend 10 on the audit plan and the planned audits for those 11 periods. 12 Q. Did you both work on the same floor? 13 A. Yes. Small building, single floor. 14 Q. Okay. And how would you describe your working 15 relationship at that time with Harriet? 16 A. I have always had a good working relationship 17 with Harriet. 18 Q. How would you describe your working 19 relationship -- strike that. 20 Do you know who Bill Piatt is? 21 A. I do. 22 Q. Who is he? 23 A. The Quality manager for our location. 24 Q. Do you know how long he's been the Quality 25 manager?</p> |
| <p style="text-align: right;">Page 10</p> <p>1 added to that, as well as a lot of I'll call it 2 miscellaneous-type of task work that I have picked up. 3 I'm also am a backup for some of our new reporting tools 4 that we have developed in-house. So it's a little bit 5 across the board on some of these job responsibilities. 6 Q. Who is your current supervisor? 7 A. My supervisor is Robert Forness out of Olean. 8 So I report to Quality management at the US ops level. 9 Q. Okay. I'm guessing Robert is not here locally. 10 A. No. He sits in Olean, New York. 11 Q. Okay. After Harriet returned from her leave, 12 did you both share the same supervisor? 13 A. I don't think so. I have an understanding of 14 who mine was. I'm not sure I understood whose Harriet's 15 was. 16 Q. Who was yours? It was Patrik, right? 17 A. It was Patrik and then I reported to Melissa 18 King and then I reported to Amy Barr and then Robert 19 Forness. 20 Q. Have you ever reported to Donna Wilson? 21 A. No. 22 Q. What department was Donna Wilson in in 2017? 23 A. She was also finance. 24 Q. Finance? 25 A. As well as Amy Barr.</p> | <p style="text-align: right;">Page 12</p> <p>1 A. Since the larger transition. So the removal of 2 Business Excellence, his role evolved, as well. So he 3 would have become the acting Quality manager for quite a 4 period of time during that transition. I cannot tell 5 you when he was formally made Quality manager, but that 6 was his role through that transition. 7 Q. Would it have been after the reorg? 8 A. Yes. The reorg precipitated all of it. 9 Q. You never worked in the Quality department, did 10 you? 11 A. In his department, no. 12 Q. Okay. And do you have any opinion how -- 13 strike that. 14 Did you ever see or witness Bill Piatt 15 treat women any differently than men? 16 A. Yes. 17 Q. Can you please tell the Court what you base 18 this on? 19 A. My personal experience and what I have seen 20 over the course of the years in my position. 21 Q. And I know this is very difficult, but can you 22 please tell us specifically what it is you experienced 23 and what you witnessed as to Bill Piatt's treatment of 24 women? 25 A. So my experience with Bill, it is difficult to</p> |

3 (Pages 9 to 12)

KATHY ELLIOTT DEGEORGE - 2/4/2020

| Page 13 | Page 15 |
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| <p>1 kind of summarize. He had issues with me. I had a 2 tendency to disagree with some of his positions. He 3 didn't care for that, and as a result, his behavior 4 reflected that. I would describe it as inappropriate. 5 I would describe it as unprofessional. 6 Q. Why -- do you think it's because you're a 7 female? 8 A. So my opinion is what you are asking for? 9 Q. Your opinion, yes. 10 MS. GRANT: And I'll just state for the 11 record, she's not here as a corporate rep for Siemens. 12 MR. BAIL: For sure. 13 A. I have heard him make derogatory comments 14 regarding women. I have witnessed the fact that when I 15 would disagree with him, I was called confrontational 16 and insubordinate, and he reported me to my manager, 17 Melissa King. He had an issue when women speak up, as 18 it's my opinion that his issue was when women speak up 19 or disagree with him when he's wrong, that is what 20 happens. 21 Q. (BY MR. BAIL) What happens? 22 A. It's everything -- well, his behavior is I'll 23 say demeaning. It is -- in my case it was somewhat 24 harassing and he will negate, correct those types of 25 things, and it's not in a polite or professional manner.</p> | <p>1 treated Harriet differently? What meeting was that? 2 A. We had an audit training session where our head 3 of the internal office for audit came to town to do 4 training and coaching with the new auditees. So several 5 of us were auditees in training. Harriet was a lead 6 auditor, and they came in largely to get it on the same 7 page at that point and cover audit topics that we might 8 be struggling with. 9 Q. Do you know when that was? 10 A. I don't recall the exact date. 11 Q. Do you think it was 2017 or 2016 or before 12 that? 13 A. I'm really sorry. I don't know. 14 Q. Okay. What was it called again? 15 A. So I called it an audit training. 16 Q. And who was present at that meeting, to your 17 recollection? 18 A. That would have been Brad Munroe, who's head of 19 central office; Bill; Andrew Loera, who was an auditor 20 in training at that point. I don't even think he was 21 coauditor at that point; Lorraine I believe had been 22 brought into the program at that point; Melissa 23 Shovelski and myself; Kimberly Long. That may not be 24 complete. 25 Q. Does Kim Long still work for the company?</p> |
| Page 14 | Page 16 |
| <p>1 Q. Understood. 2 And in regards to Harriet, have you ever 3 seen or witnessed Bill treat Harriet in a hostile 4 manner? 5 A. I would say that in our one training session 6 that we were all in together, as Harriet was trying to 7 make her points about the audit process and some 8 misinformation that was being shared by Bill, I would 9 say that he treated her with somewhat of the same 10 condescending, demeaning method of negating her opinion 11 and her comments. 12 Q. In terms of location of your office to where 13 Harriet was located, how close were you physically? 14 A. So we all relocated several times, but we're in 15 a cubicle environment, and I was two cubicles away from 16 Harriet on the same aisle at our last relocation. 17 Q. Were you close enough to hear the specifics of 18 her communications with other individuals? 19 A. I probably could have. I was close enough. 20 Q. But it's fair to say you weren't always a 21 witness to all communications between Bill and my 22 client, correct? 23 A. No, not at all. I tend to be away from my desk 24 quite a bit, too. 25 Q. What meeting was it that you state that Bill</p> | <p>1 A. She does. She's in a new position in Olean, 2 New York. 3 Q. And Melissa Shov- -- 4 A. Shovelski. 5 Q. She still works for Siemens, correct? 6 A. Yes, in another location and another position 7 now. 8 Q. Okay. Do you know what? 9 A. Digital Industries, around 290 and the Beltway. 10 Q. Okay. Still local? 11 A. Uh-huh. 12 Q. Did Bill ever make any racially -- racial 13 comments regarding my client? 14 A. Not that I heard. 15 Q. Okay. Did you hear anybody make any racial 16 comments about my client behind her back? 17 A. No. 18 Q. Other than what you have testified to about the 19 examples of Bill's behavior, is there anything else that 20 you can think of that you would like to add? 21 A. About what? 22 Q. His treatment, whether you remember any other 23 examples of him treating women negatively. 24 A. I know that Kimberly Long had a similar issue. 25 Q. What was her issue?</p> |

4 (Pages 13 to 16)

KATHY ELLIOTT DEGEORGE - 2/4/2020

| Page 17 | Page 19 |
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| <p>1 MS. GRANT: Objection; form.</p> <p>2 Q. (BY MR. BAIL) Strike that.</p> <p>3 Do you recall what issue Kimberly Long had</p> <p>4 that you were about to testify to?</p> <p>5 A. I can tell you her comment to me.</p> <p>6 Q. Please.</p> <p>7 A. And that was strictly that she had raised a</p> <p>8 similar issue with Bill where she was disagreeing with</p> <p>9 him and he called her confrontational, and she was</p> <p>10 basically being negated, as well, but it turned into a</p> <p>11 bit of a loud scene in his office.</p> <p>12 Q. Okay.</p> <p>13 A. I was not present. That was going from what</p> <p>14 she told me.</p> <p>15 Q. You just testified that he thought she was</p> <p>16 confrontational?</p> <p>17 A. He called her confrontational.</p> <p>18 Q. Did he also call you confrontational?</p> <p>19 A. He reported me as being confrontational to my</p> <p>20 manager, Melissa King.</p> <p>21 Q. Okay. Do you know of any other females that</p> <p>22 worked for Siemens that confided in you about Bill</p> <p>23 Piatt's behavior?</p> <p>24 A. Not to my knowledge. I know that Harriet,</p> <p>25 Kimberly and I had similar experiences.</p> | <p>1 You discussed this audit training session</p> <p>2 meeting and your belief that Mr. Piatt was speaking to</p> <p>3 Ms. Lane in a certain manner because she was a female.</p> <p>4 Do you recall that testimony?</p> <p>5 A. I think what I said was that it was demeaning</p> <p>6 and condescending in the way he negated her.</p> <p>7 Q. And is it your testimony you believe it was</p> <p>8 because she was a female?</p> <p>9 A. I'll say it is my belief.</p> <p>10 Q. And is this based solely on your own personal</p> <p>11 belief and opinion?</p> <p>12 A. It is based on my experience with him. So that</p> <p>13 forms my belief and my opinion.</p> <p>14 Q. Were you involved in any discussions regarding</p> <p>15 discipline taken against Ms. Lane?</p> <p>16 A. With management?</p> <p>17 Q. Yes.</p> <p>18 A. No.</p> <p>19 Q. Were you ever involved in any discussions or</p> <p>20 decisions regarding Ms. Lane's termination of her</p> <p>21 employment?</p> <p>22 A. No.</p> <p>23 Q. Were you ever involved in any discussions with</p> <p>24 management regarding the removal of Ms. Lane's duties?</p> <p>25 A. No.</p> |
| Page 18 | Page 20 |
| <p>1 Q. Okay. Did any person from the Human Resources</p> <p>2 department of Siemens contact you for an investigation</p> <p>3 regarding my client?</p> <p>4 A. No.</p> <p>5 Q. Do you know who Linda Hubbard is?</p> <p>6 A. Yes.</p> <p>7 Q. How do you know her?</p> <p>8 A. She was our HR rep for our site before she</p> <p>9 transferred to a different location.</p> <p>10 Q. Do you know why she transferred to a different</p> <p>11 location?</p> <p>12 A. No, I do not.</p> <p>13 Q. Do you know who Toni Horton is?</p> <p>14 A. Yes.</p> <p>15 Q. Who is that?</p> <p>16 A. She's our current HR representative for our</p> <p>17 location.</p> <p>18 MR. BAIL: No further questions. I pass</p> <p>19 the witness.</p> <p>20 MS. GRANT: I have just a couple follow-up</p> <p>21 questions.</p> <p>22 E X A M I N A T I O N</p> <p>23 BY MS. GRANT:</p> <p>24 Q. Good morning. I'm Ashlee Grant. I am here on</p> <p>25 behalf of Siemens.</p> | <p>1 Q. Do you have any personal knowledge regarding</p> <p>2 any decisions related to placing Ms. Lane on any</p> <p>3 disciplinary action or performance improvement plan?</p> <p>4 A. From management?</p> <p>5 Q. Yes.</p> <p>6 A. No.</p> <p>7 Q. Do you have any personal knowledge regarding</p> <p>8 management's decision to terminate Ms. Lane's</p> <p>9 employment?</p> <p>10 A. I do not.</p> <p>11 Q. Do you have any personal knowledge regarding</p> <p>12 the decision of removing any of Ms. Lane's duties by</p> <p>13 management?</p> <p>14 A. The reason?</p> <p>15 Q. Yes.</p> <p>16 A. No, I do not.</p> <p>17 Q. Do you have any personal knowledge regarding</p> <p>18 Mr. Piatt's involvement in any disciplinary action taken</p> <p>19 against Ms. Lane?</p> <p>20 A. Personal knowledge, no, I do not.</p> <p>21 Q. Do you have any personal knowledge regarding</p> <p>22 any involvement by Mr. Piatt, if any, in the decision to</p> <p>23 terminate Ms. Lane's employment?</p> <p>24 A. I do not.</p> <p>25 Q. Do you have any personal knowledge regarding</p> |

5 (Pages 17 to 20)

KATHY ELLIOTT DEGEORGE - 2/4/2020

Page 21

1 Mr. Piatt's involvement in any decisions related to the
 2 removal of Ms. Lane's duties?
 3 A. Other than the fact that he was over that
 4 program at that time, no.
 5 Q. And then one just follow-up, did you ever
 6 assume any of the roles and responsibilities that
 7 Harriet had -- Ms. Lane, that she had performed while
 8 she was employed at Siemens?
 9 A. No.
 10 MS. GRANT: I have no further questions.
 11 MR. BAIL: No further questions.
 12 THE REPORTER: Any further stipulations
 13 before I close the record?
 14 MS. GRANT: We will read and sign.
 15 (The deposition concluded at 11:09 a.m.)
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Page 22

1 CHANGES AND SIGNATURE
 2 WITNESS NAME: KATHY ELLIOTT DEGEORGE
 3 DATE OF DEPOSITION: FEBRUARY 4, 2020
 4 PAGE LINE CHANGE REASON
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 25 JOB NUMBER: 18930

Page 23

1 I, KATHY ELLIOTT DEGEORGE, have read the foregoing
 2 deposition and hereby affix my signature that same is
 3 true and correct, except as noted above.
 4
 5 _____
 6 KATHY ELLIOTT DEGEORGE
 7
 8 THE STATE OF _____
 9 COUNTY OF _____
 10
 11 Before me, _____, on this day
 12 personally appeared KATHY ELLIOTT DEGEORGE, known to me
 13 (or proved to me under oath or through _____)
 14 (description of identity card or other document)) to be
 15 the person whose name is subscribed to the foregoing
 16 instrument and acknowledged to me that they executed the
 17 same for the purposes and consideration therein
 18 expressed.
 19 Given under my hand and seal of office this
 20 ____ day of _____, 2020.
 21
 22 _____
 23 NOTARY PUBLIC IN AND FOR
 24 THE STATE OF _____
 25 JOB NUMBER: 18930

Page 24

1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE SOUTHERN DISTRICT OF TEXAS
 3 HOUSTON DIVISION
 4 HARRIET LANE, *
 5 *
 6 Plaintiff, *
 7 *
 8 v. * C.A. No. 4:19-cv-00435
 9 *
 10 SIEMENS ENERGY, INC., * JURY TRIAL DEMANDED
 11 *
 12 Defendant. *
 13 *
 14
 15 REPORTER'S CERTIFICATION
 16 ORAL DEPOSITION OF
 17 KATHY ELLIOTT DEGEORGE
 18 FEBRUARY 4, 2020
 19 I, CONSTANCE KOENIG, RPR, Certified Shorthand
 20 Reporter in and for the State of Texas, hereby certify
 21 to the following:
 22 That the witness, KATHY ELLIOTT DEGEORGE, was
 23 duly sworn by the officer and that the transcript of the
 24 deposition is a true record of the testimony given by
 25 the witness;
 That the original deposition was delivered to
 Ashok Bail, Custodial Attorney.
 That a copy of this certificate was served on
 all parties shown herein on _____.
 I further certify that pursuant to FRCP
 Rule 30(f)(1) that the signature of the deponent:
 ___X___ was requested by the deponent or a party
 before the completion of the deposition and that

6 (Pages 21 to 24)

KATHY ELLIOTT DEGEORGE - 2/4/2020

Page 25

signature is to be returned within 30 days from the date of receipt of the transcript. If returned, the attached Changes and Signature Page contains any changes and the reasons therefore.

_____ was not requested by the deponent or party before the completion of the deposition.

I certify that I am neither attorney or counsel for, related to, nor employed by any of the parties or attorneys in the action in which this testimony was taken. Further, I am not a relative or employee of any attorney of record in this cause, nor am I financially or otherwise interested in the outcome of the action.

Certified to by me this, the 10th day of February 2020.

CONSTANCE KOENIG, Texas CSR 6577

Expiration Date: 01-31-2021

Hanna & Hanna, Inc.

CRF - 10434 - Expiration: 10-31-2022

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7 (Page 25)

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